UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONVERGEN ENERGY LLC, L'ANSE WARDEN ELECTRIC COMPANY, LLC, EUROENERGY BIOGAS LATVIA LIMITED, and LIBRA CAPITAL US, INC. Plaintiffs, -against- STEVEN J. BROOKS, NIANTICVISTA ENERGY LLC, GREGORY MERLE, RIVERVIEW ENERGY CORPORATION, DANIEL ESCANDON GARCIA, RAMON URIARTE INCHAUSTI, CHIPPER INVESTMENT SCR, SA, URINCHA SL, THEODORE JOHN HANSEN, BRIAN R. MIKKELSON, and CONVERGEN ENERGY WI, LLC, Defendants.	Index No. 1:20-cv-03746 (LJL)

DECLARATION OF DOV B. GOLD
IN SUPPORT OF PLAINTIFFS' MOTION TO STAY ARBITRATION

I, Dov B. Gold, declare as follows:

1.   I am an Associate at the Seiden Law Group, which is counsel of record for plaintiffs Convergen Energy LLC, L'Anse Warden Electric Company, LLC, Euroenergy Biogas Latvia Limited, and Libra Capital US, Inc. (collectively, "Plaintiffs") in the above-captioned matter. I am licensed to practice law in the State of New York.

2.   I make this declaration in support of Plaintiffs' Motion to Stay Arbitration.

3.   I make this declaration based on my own personal knowledge, and, if called upon to do so, could and would testify competently thereto.

4.   Attached as Exhibits 1 through 3 are true and correct of the following documents:

Exhibit 1:   The Engineered Fuel Supply Agreement ("Supply Agreement") between L'Anse Warden Electric Company, LLC and Convergen Energy, WI, LLC, dated January 31, 2020.

Exhibit 2:   The Amended and Restated Closing Statement ("Restated Closing Statement") between Convergen Energy, LLC and Nianticvista Energy LLC, concerning the acquisition of the Fuel Pellet Company located at 600 Liberty St, Green Bay, WI 54304, and dated February 21, 2020.

Exhibit 3:   The Commercial Arbitration Rules Demand for Arbitration ("Demand for Arbitration") made by Convergen Energy, WI, LLC, and dated June 4, 2020.

I declare under the penalty of perjury that the foregoing is, to the best of my knowledge and belief, true and correct.

Dated: New York, New York
      June 23, 2020

/s/ Dov B. Gold
Dov B. Gold